## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

ASTRAZENECA AB, AKTIEBOLAGET HÄSSLE and ASTRAZENECA LP, KBI INC. and KBI-E INC.,

07-CV-6790 (CM)(FM)

Plaintiffs and

Counterclaim-Defendants,

v.

DR. REDDY'S LABORATORIES, LTD. and DR. REDDY'S LABORATORIES, INC.

> Defendants and Counterclaim-Plaintiffs.

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## ASTRAZENECA'S MOTION TO FILE UNDER SEAL ITS MEMORANDUM OF LAW IN OPPOSITION TO DRL'S SUMMARY JUDGMENT MOTION AND SUPPORTING DECLARATIONS, AFFIDAVITS AND EXHIBITS

Plaintiff AstraZeneca AB, Aktiebolaget Hässle, AstraZeneca LP, KBI Inc. and KBI-E Inc. (collectively "AstraZeneca") respectfully moves this Court for an order granting leave to file under seal its Memorandum of Law In Opposition To DRL's Motion For Summary Judgment, Response To DRL's Rule 56.1 Statement and supporting declarations, affidavits and exhibits. AstraZeneca expects to file these papers tomorrow, July 30, 2008.

In support of this motion, AstraZeneca states that the Opposition and accompanying documents contain information Defendants have identified as confidential. AstraZeneca expects that this confidential information will appear on almost every page of the papers as well as in the accompanying exhibits and declarations. AstraZeneca informed DRL that it intends to seek the Court's leave to file its papers under seal and DRL has consented to the filing of its confidential information under seal.

Accordingly, AstraZeneca respectfully requests that the Court order that AstraZeneca's Opposition to DRL's motion and attached exhibits be filed under seal and that they only be accessible by the Court and the parties.

A proposed order is submitted herewith.

Date: July 29, 2008

By:

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